

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
MEI L. WANG, MICHAEL Y.J. WANG,  
CHUN FANG WANG,

07 CV 05462 (BSJ)

v.

Plaintiffs,

**ANSWER TO SECOND  
AMENDED COMPLAINT**

CYR INTERNATIONAL, INC., CHEW  
YOUNG ROO AMERICA, INC. CYR USA,  
INC., CHEW YOUNG ROOM, INC., CHEW  
YOUNG ROOM, CHEW YOUNG ROO,  
EUN CHAN LIM, CHEW YOUNG ROO,  
INC., CHEW YOUNG ROO, INC., C & Tel,  
CYRCO., LTD., Sung Soo Park,

Defendants.

-----X

Defendants, CYR INTERNATIONAL, INC., CYR USA, INC., CHEW YOUNG ROO  
AMERICA, INC. and EUN CHAN LIM, by their attorneys LITCHFIELD CAVO LLP,  
answering the amended complaint of the plaintiffs, states as follows:

1. Deny any knowledge or information sufficient to form a belief as to each and every allegation contained in the paragraphs of the Complaint numbered, “1”, “5”, “6”, “7”, “9”, “10”, “11”, “12”, “13”, “14” and “15”.
2. Deny each and every allegation contained in the paragraphs of the Complaint numbered “17” and “18”.
3. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered “19” thereof as hereinbefore denied.

4. Deny any knowledge or information sufficient to form a belief as to each and every allegation contained in the paragraphs of the Complaint numbered "20", "22", "24", "25", "26", "27", "28", "29", "30", "32", "35", "36" and "41".

5. Deny each and every allegation contained in the paragraphs of the Complaint numbered "21", "23", "31", "33", "34", "37", "38", "39" and "40".

6. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered "42" thereof as hereinbefore denied.

7. Deny each and every allegation contained in the paragraphs of the Complaint numbered "43" and "44".

8. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered "45" thereof as hereinbefore denied.

9. Deny each and every allegation contained in the paragraphs of the Complaint numbered "46" and "47".

10. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered "48" thereof as hereinbefore denied.

11. Deny each and every allegation contained in the paragraphs of the Complaint numbered "49".

12. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered "50" thereof as hereinbefore denied.

13. Deny each and every allegation contained in the paragraphs of the Complaint numbered "51" and "52".

14. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered "53" thereof as hereinbefore denied.

15. Deny each and every allegation contained in the paragraphs of the complaint numbered "54".

16. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered "55" thereof as hereinbefore denied.

17. Deny each and every allegation contained in the paragraphs of the complaint numbered "56".

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

18. That the complaint fails to set forth facts sufficient to constitute a cause and/or causes of action upon which relief may be granted insofar as this defendant is concerned.

**AS AND FOR A SECOND AFFIRMATIVE DEFENSE**

19. Plaintiffs lack personal jurisdiction over the defendants.

**AS AND FOR A THIRD AFFIRMATIVE DEFENSE**

20. Additional facts may be revealed by future discovery that supports additional affirmative defenses presently available but unknown to answering defendants. Therefore, answering defendants reserve the right to assert additional defenses in the event that discovery and investigation indicate that additional defenses would be appropriate.

**AS AND FOR A FOURTH AFFIRMATIVE DEFENSE**

21. Defendant, CHEW YOUNG ROO AMERICA, INC., does not transact business within the State of New York, nor provides good and services within the State of New York, or has a business presence within the State of New York. Accordingly, the Court lacks jurisdiction over this defendant.

WHEREFORE, these answering defendants pray that the Court:

- i. dismiss plaintiffs' claims
- ii. deny plaintiffs' prayer for an injunction
- iii. award defendants costs, disbursements and attorneys fees and
- iv. award defendants such other relief as the Court deems just and proper.

Dated: New York, New York  
July 16, 2008

---

Daniel T. Hughes, Esq. (4622)

LITCHFIELD CAVO LLP  
420 Lexington Avenue, Suite 2104  
New York, NY 10170  
(212) 434-0100  
*Attorneys for Defendants*  
**CYR INTERNATIONAL, INC.,**  
**CYR USA, INC and**  
**EUN CHAN LIM**

TO: MEREDITH & KEYHANI, PLLC  
330 Madison Avenue, 6<sup>th</sup> Floor  
New York, NY 10017  
(212) 760-0098

*Attorneys for Plaintiffs*

FELDMAN WEINSTEIN & SMITH LLP  
420 Lexington Avenue  
New York, NY 10170  
(212) 931-8701

*Attorneys for Defendants, Chew Young Roo Inc.*